

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**LAURA WONDERCHECK,**

§ § § § § § § § § §

**Plaintiff,**

§§§§

V.

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**CIVIL ACTION NO. 1:19-cv-00640-LY**

**MAXIM HEALTHCARE SERVICES,  
INC.,**

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## Defendant.

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**STIPULATION TO EXTEND DISPOSITIVE MOTION DEADLINE**

Plaintiff Laura Wondercheck and Defendant Maxim Healthcare Services, Inc., by and through their respective counsel, hereby stipulate and agree that good cause exists to extend the dispositive motion deadline from July 31, 2020, to August 17, 2020. Defendant agreed to permit Plaintiff to conduct four depositions of former employees of Defendant after the discovery deadline in this matter. Because these depositions were conducted following the discovery deadline, the parties will not have sufficient time to obtain, review, and approve the deposition transcripts in advance of the current deadline for filing dispositive motions. A brief extension of the deadline will provide both parties adequate time to prepare any dispositive motions in this matter, and the Parties hereby notify the Court they have agreed to extend this deadline to August 17, 2020.

Dated: July 28, 2020

Respectfully submitted,

/s/ Lindsay Hedrick

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 28, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send electronic notice to all counsel of record.

*/s/ Lindsay Hedrick*  
Lindsay Hedrick